

Jaimee Katz Sussner, Esq.  
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*Attorneys for Court-Appointed Receiver*  
*Colliers International NJ, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X	
THREE LINE-NJ1, LLC	: Civil Action No. 19-cv-17421 (MCA)(LDW)
	:
Plaintiff,	: <i>Document Electronically Filed</i>
	:
vs.	:
	:
SETH LEVINE, PA WATSON VENTURES,	: <b>NOTICE OF MOTION FOR ORDER</b>
LLC, <i>et al.</i> ,	: <b>APPROVING SALE OF CERTAIN REAL</b>
	: <b>PROPERTY FREE AND CLEAR</b>
	:
Defendants.	: <b>ORAL ARGUMENT REQUESTED</b>
	:
	:
	: <b>Motion Day: December 20, 2021</b>
	:
	:
-----X	
THREE LINE-NJ1, LLC, <i>et al.</i> ,	: Civil Action No. 19-cv-17865 (MCA)(LDW)
	:
Plaintiffs,	:
	:
v.	:
	:
ENGLEWOOD FUNDING LLC,	:
PLAINFIELD NORSE, LLC, POST	:
AVENUE VENTURES, LLC, FLR	:
VENTURES LLC, CLIFTON FL	:
VENTURES LLC, 137-139 THIRD NORSE	:
LLC, PASSAIC NORSE LLC, PERTH NB	:
VENTURES LLC, SETH LEVINE, <i>et al.</i> ,	:
	:
Defendants.	:
	:
-----X	

TO: ALL PARTIES ON THE ATTACHED SERVICE LIST

**PLEASE TAKE NOTICE** that, on December 20, 2021, or as soon thereafter as counsel may be heard, the undersigned counsel for Colliers International NJ LLC, the Court-appointed Receiver for the properties that are subject of the referenced actions (the “Receiver”), shall move before the Honorable Madeline Cox Arleo, U.S.D.J., District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order approving Receiver’s sale of the real property owned by Defendants Englewood Funding LLC, FLR Ventures LLC, PA Watson Ventures LLC, Perth NB Ventures LLC, Clifton DL Ventures LLC, 137-139 Third Norse LLC, Post Avenue Ventures LLC, and Passaic Norse LLC, free and clear of all prior encumbrances, liens, rights, and interest, approving the Receiver’s disbursement of proceeds from the sale, and for related relief, pursuant to the prior Orders of this Court and Fed. R. Civ. P. 66.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Receiver shall rely on the accompanying Declarations of Richard Madison and Jaimee Katz Sussner, Esq., with accompanying exhibits, and all pleadings and proceedings on file.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order granting Receiver’s Motion is enclosed herewith.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), the Receiver hereby requests oral argument only if opposition is filed.

Respectfully submitted,

s/ Jaimee Katz Sussner  
JAIMEE KATZ SUSSNER  
*Attorneys for Court-Appointed  
Receiver Colliers International  
NJ LLC*

Dated: November 23, 2021

**SERVICE LIST**

1. 137-139 Third Norse, LLC (*Via First Class Mail*)  
Clifton DL Ventures LLC  
Englewood Funding, LLC  
FLR Ventures LLC  
Passaic Norse LLC  
PA Watson Ventures, LLC  
Perth NB Ventures LLC  
Post Avenue Ventures LLC  
c/o Mr. Seth Levine  
636 South Forest Drive  
Teaneck, New Jersey 07666
2. Jacob Kaplan, Esq. (*Via Email*)  
Brafman & Associates, P.C.  
767 Third Avenue, 26<sup>th</sup> Floor  
New York, New York 10017  
*Counsel for Defendant Seth Levine*
3. Maureen E. Montague, Esq. (*Via Email*)  
Greenbaum, Rowe, Smith & Davis LLP  
99 Wood Avenue South  
Iselin, New Jersey 08830  
*Counsel for Three Line-NJ1, LLC*
4. Madison Park Investors, LLC (*Via First Class Mail*)  
88 Washington Avenue  
Cedarhurst, New York 11516
5. Michael R. Caruso, Esq. (*Via Email*)  
Chiesa Shahinian & Giantomasi PC  
One Boland Drive  
West Orange, New Jersey 07052  
*Counsel for Madison Park Investors, LLC*
6. Oritani Bank (*Via First Class Mail*)  
Attention: Christopher Carola, Vice President  
370 Pascack Road  
P.O. Box 1329  
Township of Washington, New Jersey 07676-1329
7. Ali Tasaloti d/b/a Touchstone Tiling (*Via First Class Mail*)  
189 Coombs Drive

Paramus, New Jersey 07652

8. Piazza & Associates, Inc. (*Via First Class Mail*)  
216 Rockingham Row  
Princeton, New Jersey 08540
9. Township of Teaneck (*Via First Class Mail*)  
818 Teaneck Road  
Teaneck, New Jersey 07666
10. Joseph R. McCarthy, Esq. (*Via Email*)  
Meyner and Landis LLP  
One Gateway Center, Suite 2500  
Newark, New Jersey 07102  
*Counsel for ZF Capital Holdings, LLC, individually and derivatively on behalf of Aljo Norse LLC, Clifton DL Ventures LLC, Perth NB Venture, LLC and Third Street Norse LLC*
11. ZF Capital Holdings LLC (*Via First Class Mail*)  
2233 Nostrand Avenue, 3<sup>rd</sup> Floor  
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12. The Law Office of David Fleischmann, P.C. (*Via First Class Mail*)  
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13. Yan Margolin, Esq. (*Via Email*)  
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154 West 14<sup>th</sup> Street  
New York, New York 10011  
*Counsel for Park National Capital Funding LLC, Herbert Tepfer, and J&J Realty Associates LLC*
14. Barry S. Miller, Esq. (*Via Email*)  
1211 Liberty Avenue  
Hillside, New Jersey 07205  
*Counsel for Park National Capital Funding LLC and Herbert Tepfer*
15. Herbert Tepfer, Esq. (*Via email: [Tepferlaw@gmail.com](mailto:Tepferlaw@gmail.com) and First Class Mail*)  
Tepfer & Tepfer P.C.  
4429 18<sup>th</sup> Avenue  
Brooklyn, New York 11204-1202

*Pro Se and for Park National Capital Funding LLC*

16. Park National Capital Funding LLC (*Via First Class Mail*)  
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Bronxville, New York 10708
17. Park National Capital Funding LLC (*Via First Class Mail*)  
280 Northern Boulevard  
Great Neck, New York 11021
18. McCarter & English, LLP (*Via First Class Mail*)  
Attention: Clement J. Farley, Esq.  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102  
*Counsel for Doral Bank, FSB*
19. Doral Bank, FSB (*Via First Class Mail*)  
387 Park Avenue South  
New York, New York 10016
20. J&J Realty Associates LLC (*Via First Class Mail*)  
4429 18<sup>th</sup> Avenue  
Brooklyn, New York 11204
21. Hutton Ventures LLC (*Via Email*)  
c/o Gerard S. Catalanello, Esq.  
Alston & Bird LLP  
90 Park Avenue  
New York, New York 10016
22. Hutton Ventures, LLC (*Via First Class Mail*)  
333 7<sup>th</sup> Avenue  
Third Floor  
New York, New York 10001
23. Englewood Funding LLC (*Via First Class Mail*)  
210 River Street, Suite 24  
Hackensack, New Jersey 07601
24. 191 Realty LLC (*Via First Class Mail*)  
120 Hillside Boulevard, Suite 18  
Lakewood, New Jersey 08701

25. Old Republic National Title Insurance Company (*Via First Class Mail*)  
400 Second Avenue South  
Minneapolis, Minnesota 55401-2499
26. OREC NJ, LLC (*Via First Class Mail*)  
10 West Broad Street, 8<sup>th</sup> Floor  
Columbus, Ohio 43215
27. Federal Home Loan Mortgage Corporation (*Via Email*)  
c/o Jerry A. Cuomo, Esq.  
Landman Corsi Ballaine & Ford P.C.  
One Gateway Center, 4<sup>th</sup> Floor  
Newark, New Jersey 07102
28. Larry Portal, Frank Maiorano, Gracy Weberman, Jahn Frodwin, Donald J. Noone II,  
Martin Goldstein, and David Metzman (*By Email and First Class Mail*)  
c/o Nathaniel Ari Weisbrot, Esq.  
Law Office of N. Ari Weisbrot LLC  
1099 Alessandrini Avenue  
New Milford, New Jersey 07646
29. Toledo Plumbing & Heating Inc. (*Via Email*)  
c/o Bittiger Elias & Triolo P.C.  
12 Route 17 North, Suite 206  
Paramus, New Jersey 07652
30. Bureau of Housing Inspection (*Via First Class Mail*)  
State of New Jersey  
Department of Community Affairs  
P.O. Box 800  
Trenton, New Jersey 08625-0800
31. State of New Jersey (*Via First Class Mail*)  
Division of Codes and Standards  
PO Box 802  
101 South Broad Street  
Trenton, NJ 08625-0802
32. Bureau of Housing Inspection (*Via First Class Mail*)  
Attention: Collections Unit  
P.O. Box 810  
Trenton, New Jersey 08625-0810

33. State of New Jersey (*Via First Class Mail and Email*)

Department of Community Affairs  
c/o Craig Keiser, Esq.  
P.O. Box 800  
Trenton, New Jersey 08625-0800

34. Bureau of Housing Inspection (*Via First Class Mail*)

State of New Jersey  
Department of Community Affairs  
P.O. Box 800  
Trenton, New Jersey 08625-0800